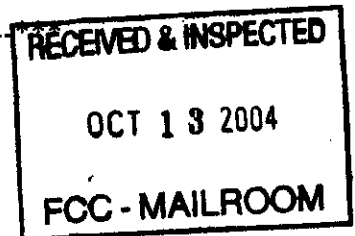


BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ORIGINAL

In re Amendment of Section 73.202(b))
of the Commission's Rules, Table of Allotments,)
FM Broadcast Stations)
(CLATSKANIE, WASHINGTON))

MM Docket No. 04-
RM-*****



DOCKET FILE COPY ORIGINAL

To: The Office of the Secretary,
for the Attention of the Assistant Chief, Audio Division, Media Bureau

**PETITION FOR RULE MAKING
AND FOR ORDER TO SHOW CAUSE**

Portmeirion Partners (*Portmeirion*), by its communications counsel, hereby asks the FCC to initiate a rule-making proceeding looking toward the allotment of Channel 225C3 to the community of Clatskanie, Oregon.

1. This Petition seeks the allotment of Channel 225C3 to Clatskanie, Washington as a first local service. The requested allotment requires a site restriction¹ to avoid a short spacings to third-adjacent-channel station KGON(FM), Channel 222C, Portland, Oregon and to first-adjacent-channel station KAST(FM), Channel 226C3, Gladstone, Oregon. The allotment of Channel 225C3 to Clatskanie requires substitution of an equivalent channel for Channel 224A at Long Beach, Washington. Station KAQX(AM), FCC Facility ID No. 38910, occupies the Long Beach allotment. Portmeirion proposes the substitution of Channel 259A at Long Beach and the

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¹ Reference point: North Latitude 46° 17' 44"; West Longitude 123° 14' 13".

concomitant modification of station KAQX's outstanding license.² Please see Exhibit A to this Petition, the Engineering Statement of Hatfield & Dawson Consulting Electrical Engineers, for a detailed discussion of the proposed substitution.

2. Portmeirion requests that the Commission issue an Order to Show Cause directed to the licensee of station KAQX with respect to the proposed channel substitution at Long Beach. As Exhibit A demonstrates, no site change by station KAQX is required. Portmeirion pledges that, if Portmeirion receives the Clatskanie construction permit, Portmeirion will reimburse the licensee of station KAQX for its reasonably and prudently incurred expenses of migrating to Channel 259A, per Circleville, Ohio, 8 FCC Rcd 159 (1967).

3. The substitution of Channel 259A for Channel 224A at Long Beach requires, in turn, a substitution for vacant Channel 259A at Ilwaco, Washington. Portmeirion suggests the substitution of Channel 253A for Channel 259A at Ilwaco, without any change in reference point.³ The substitution of Channel 253A at Ilwaco for Channel 259A will create a nine-kilometer short spacing to station CIOC-FM, Channel 253C, Victoria, British Columbia. However, as Exhibit A demonstrates, this can be done consistent with the U.S.-Canadian Agreement on FM Broadcasting, if Channel 259A is allotted as a specially negotiated, short-

²Portmeirion proposes the use of the coordinates of station KAQX's licensed main transmitter site as the reference point for Channel 259A at Long Beach. Those licensed coordinates are North Latitude 46° 18' 51", West Longitude 124° 3' 7".

³The coordinates of the Ilwaco allotment's reference point are North Latitude 46° 18' 33", West Longitude 124° 2' 31".

spaced allotment. Accordingly, Portmeirion requests the FCC to seek the concurrence of the Canadian government to the allotment of Channel 253A to Ilwaco.⁴

4. As Exhibit A also indicates, the proposed allotments of Channel 259A to Long Beach and of Channel 253A to Ilwaco comport with domestic spacing requirements. Because no site changes would be involved, there is no issue concerning city-grade service to Long Beach and to Ilwaco. Exhibit A also demonstrates that the proposed allotment of Channel 225C3 would result in full city-grade-service to Clatskanie.

5. Schematically, Portmeirion's proposal is as follows:

COMMUNITY	PRESENT ALLOTMENT	PROPOSED ALLOTMENT
Clatskanie, Oregon	---	225C3
Long Beach, Washington	224A	259A
Ilwaco, Washington	259A, 280C3	253A, 280C3

6. The requested allotment will provide Clatskanie, an incorporated city with a 2000 Census population of 1,528 persons with its first local service. Grant of the proposed allotment at Clatskanie will also provide a total of 110,761 persons within the 60-dBμ contour with an additional aural service.

7. The City of Clatskanie, Columbia County, Oregon, is located in the timber-covered valley of the Clatskanie River, two miles upstream from the Columbia River, in the northwest

⁴As Exhibit A demonstrates, the Commission can dispense with altering the allotment at Ilwaco if it substitutes Channel 253A for Channel 224A at Long Beach. Similar specially-negotiated-short-spaced-allotment considerations apply. Portmeirion will defer to the Commission as to the most appropriate way to handle this. If the Commission deems the substitution of Channel 253A for Channel 224A at Long Beach is the preferred approach, the Order to Show Cause directed to the licensee of station KAQX should so specify.

section of the County. In 1852, Thomas Hodkins, E.G. Bryants, Enoch Conyers and Isaac Waggoners traveled by boat down the Columbia River to settle this area. They were greeted by thickly forested hills encompassing a small grassland area. E.G. Bryant and his wife laid out their property in these grasslands and named their "town" Bryantville. It became part of Clatskanie when Columbia County was formed from part of Washington and Clatsop Counties in 1854. Clatskanie appeared on the official post-office list as early as 1871. The Clatskanie Post Office is today located at 90 SW Belair Drive in Clatskanie. Clatskanie's ZIP Code is 97016.

8. Clatskanie is governed by a Mayor, a 6-member elected council, and a city manager. The Clatskanie City Police, which has four officers, provides police protection. The Clatskanie Rural Fire Protection District responds to fire and ambulance calls for the city and the surrounding areas, with 60 paid or volunteer firefighters.

9. The Clatskanie People's Utility District provides electrical service to the city and to adjoining areas. The city-owned water system includes two dams and reservoirs, one with one million-gallon capacity, the other with a 500,000-gallon capacity. Clatskanie Sanitary Service provides garbage pickup for residential and commercial addresses. The city of Clatskanie, and the immediate rural areas around the city, are served by the Columbia 6-J School District. It offers a complete education and sports program to approximately 900 students with one elementary, one middle and one high school, all located in Clatskanie.

10. Georgia Pacific Corporation's Wauna Paper Mill, about ten miles east of Clatskanie, is the area's largest employer, with about 700 employees. The second largest employer is the Columbia 6-J School District, with 122 employees. These combine with Stimson Lumber Mill,

Fibre Farm, PGE's Beaver Turbine Generation Plant, and the logging and farming that take place in the rural areas around the city to form Clatskanie's principal industries.

11. The Clatskanie Chamber of Commerce is a group of merchants, service agents and individuals who regularly gather together in a united effort to promote and better the town of Clatskanie. Meetings are the first Thursday of each month. The Chamber maintains a web site at www.clatskanie.com/chamber.

12. Many local businesses and groups use "Clatskanie" in their names, including: Clatskanie Motel, Clatskanie Clinic, Clatskanie Dental Clinic, Clatskanie Family Chiropractic, Clatskanie Interfaith Council, Clatskanie Kiwanis, Clatskanie Market & Video, Clatskanie Mini Storage, Clatskanie Mini Mart, Clatskanie Rifle & Pistol Club, and Clatskanie Senior Citizens.

13. The Clatskanie Kiwanis Club has been in operation since June, 1928. Comprising sixty-plus members, the Club has a continuing program of community service. Since 1997, over \$9000 has been raised for the International project to eliminate Iodine Deficiency Disease world wide. For some time the club has presented three \$1000 scholarships each year to a graduating Clatskanie High School senior. The club also sponsors a community Easter egg hunt, the local DARE project, Senior Center, and the high school Key Club and a mid-school Kiwanis group, called Builders Club. The Kiwanis Club meets every Tuesday.

14. A notable historic landmark in Clatskanie is the "Flippin Castle." Commissioned about 1898 by Thomas Flippin and built by Markwell & Sons, the Flippin Castle stands high on the hill in Clatskanie. Designated a National Historic Site, the castle is maintained by the Clatskanie Senior Citizens and is open to the public for tours Monday through Friday. The house has been restored as near as possible to its original state.

15. In 1988, the Clatskanie City Council established the Clatskanie Arts Commission. As of 1996, the Commission became an independent, Section-501(c)(3) non-profit corporation with an all-volunteer board. The Clatskanie Arts Commission has defined as its objectives:

- to bring professional artists of all disciplines to the Lower Columbia Region;
- to give people of all ages access and exposure to a variety of art forms and cultural diversity; and
- to expand learning opportunities for students through workshops and assemblies.

The Arts Commission sponsors theatrical and musical performances which are held at the Donovan Wooley Performing Arts Center at the high school.

16. Many churches are located in Clatskanie, including the Apostolic Lutheran Church, the Clatskanie Baptist Church, the Faith Lutheran Church, Gateway Worship Center, the Mayger-Downing Community Church, the Mist-Birkenfield Community Church, the Clatskanie Presbyterian Church, and the United Methodist Church.

17. The Clatskanie Chief is an independent, family-owned weekly newspaper covering the people, places and events of Northern Columbia County and Eastern Clatsop County since 1891. Since 1922, the Clatskanie Chief has been owned and operated by three generations of the Steele family. The Clatskanie Chief is rich in good will and loyalty among its readers, as demonstrated by numerous local and statewide awards, including: The Oregon Education Association's Media Award- 1990; membership in The Oregonian's "100 Year Club" in recognition of "a century of public service"- 1991; the Columbia County Fair Board's "Friends of 4-H Award"-1992; Oregon State University's Small Family Business of the Year Award- 1993; the Oregon Athletic Director Association "Distinguished Service Award"- 1993; the Clatskanie

Arts Commission "Outstanding support of the Arts" award- 1994; the OSU Extension Service "Outstanding Cooperator Award"- 1995; the Knappa Future Farmers of America "Distinguished Service Award"-1996; and the 2003 Oregon Education Media Association Award.

18. Several annual events take place in Clatskanie. The Clatskanie Kiwanis Club sponsors an annual Easter Egg Hunt at the high school on the Saturday before Easter. Local Memorial Day observances include a community breakfast at the American Legion Hall, services honoring veterans at Maplewood Cemetery and the "Avenue of the Flags" at Murray Hill Cemetery, a patriotic parade down Nehalem Street, which culminates at the Nehalem Street bridge, where those servicemen who died at sea are honored from the bridge. Clatskanie Heritage Days (coordinated by the Clatskanie Chamber of Commerce and the Heritage Days Committee) are held to coincide with the Fourth of July. Events include a "Classic Car Show" with 1950's music, a "Strut Your Mutt" dog show, a "Pie in the Park" baking contest, a log show, and an old-fashioned soda fountain, a parade, and a barbecue. Some years have also included a talent show and canoe races - all climaxing with a firework spectacular.

19. A new tradition in community celebrations was established a few years ago when merchants of the Clatskanie Chamber of Commerce began celebrating "The Spirit of Christmas in Clatskanie." This event is designed to encourage residents to experience the pleasures of shopping in their own hometown and avoid the hectic pace, rude clerks and traffic snarls of the cities. "The Spirit of Christmas in Clatskanie" has been expanded to include a "Christmas Tour of Trees" in beautifully decorated local homes, horse-drawn carriage rides, business open houses, caroling, visits with Santa Claus and a lighting ceremony at the community Christmas tree. A collector's series of "Spirit of Christmas in Clatskanie" tree ornaments featuring historic scenes in

Clatskanie, was inaugurated in 1993, with new editions each year. Sales of the ornaments benefit the community street-lighting and -decorating fund.

20. Clatskanie's incorporated status is *prima facie* evidence of its worthiness to enjoy a first local service. But above and beyond those factors, Clatskanie is clearly a vibrant community that richly deserves a local commercial FM service. Allotting Channel 225C3 to Clatskanie will clearly further the goals of Section 307(b) of the Communications Act of 1934, as amended.

21. Portmeirion states its intent to apply for a construction permit for Channel 225C3 at Clatskanie, if allotted. Portmeirion further states its intent, should Portmeirion be awarded the construction permit, to build the authorized facilities, to place the constructed facilities into broadcast service, and to seek a license to cover those facilities.

CONCLUSION

22. For all of the above reasons, the staff should promptly issue a Notice of Proposed Rule Making and Order to Show Cause proposing the adoption of Portmeirion Partners' request, the allotment of Channel 229A to the community of Clatskanie, Oregon, and the suitable modification of station KAQX's license to accommodate the new allotment.

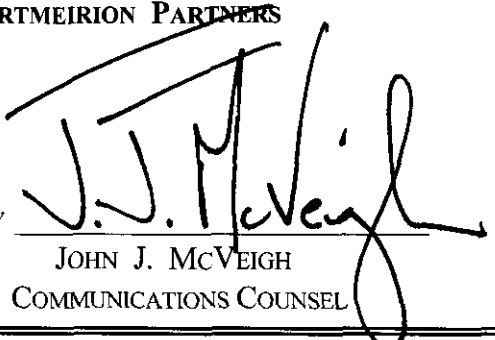
<p>JOHN J. McVEIGH, ATTORNEY AT LAW 12101 BLUE PAPER TRAIL COLUMBIA, MARYLAND 21044-2787</p> <p>TELEPHONE: 301.596.1655 TELECOPIER: 301.596.1656</p> <p>DATE: OCTOBER 6, 2004</p>	<p>Respectfully submitted,</p> <p>PORTMEIRION PARTNERS</p> <p></p> <p>By _____ JOHN J. McVEIGH ITS COMMUNICATIONS COUNSEL</p>
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EXHIBIT A

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE
STEPHEN S. LOCKWOOD, PE
DAVID J. PINION, PE

PAUL W. LEONARD, PE
ERIK C. SWANSON, EIT
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AUSTRALIA

ENGINEERING STATEMENT

**PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS FOR THE FEDERAL
COMMUNICATIONS COMMISSION**

**TO ASSIGN FM CHANNEL 225C3
FOR USE AT CLATSKANIE, OR**

**TO ASSIGN FM CHANNEL 259A
FOR USE AT LONG BEACH, WA**

**TO ASSIGN FM CHANNEL 253A
FOR USE AT ILWACO, WA**

PORTMEIRION PARTNERS

OCTOBER 2004

Engineering Statement

This Engineering Statement has been prepared on behalf of Portmeirion Partners ("Portmeirion"), in support of a Petition for Rulemaking to amend §73.202 of the Commission's Rules to:

- 1) Allot Channel 225C3 for use at Clatskanie, Oregon;
- 2) Substitute Channel 259A for Channel 224A at Long Beach, Washington, for use by FM station KAQX, and;
- 3) Substitute Channel 253A for vacant Channel 259A at Ilwaco, Washington.

The proposed reallocation plan will provide several benefits:

- 1) Clatskanie, an incorporated city with a 2000 Census population of 1,528 persons, will receive its first local service.
- 2) A total of 110,761 persons will receive an additional aural service.
- 3) In accommodating the benefits listed above, no white, gray, or underserved areas will be created.

Channel 225C3 at Clatskanie, Oregon

As outlined in the attached channel study, Channel 225C3 can be assigned for use at Clatskanie in compliance with the Commission's applicable Rules and Regulations regarding

Hatfield & Dawson Consulting Engineers

the separation among FM allotments, assuming that Channel 259A is substituted for Channel 224A at Long Beach. A site restriction is necessary in order to prevent short-spacing to KGON Channel 222C Portland and KAST Channel 226C3 Gladstone. An allotment site for Channel 225C3 at Clatskanie has been located at N46-17-44 x W123-14-13. While this is not the closest fully-spaced location to Clatskanie, these particular coordinates have been chosen because the high terrain to the immediate east, west, and south of Clatskanie necessitates the use of an allotment site to the north of Clatskanie to ensure that there is no major obstruction of the path into the community.

Nevertheless, Portmeirion would also accept a Clatskanie allotment site at a site nearer to the community (such as N46-15-20 x W123-20-15) should the Commission determine that the terrain obstructions between that site and Clatskanie are not significant enough to preclude 70 dBu service to the community.

The chosen allotment site is 22.5 kilometers from the far side of Clatskanie. The nominal distance to the 70 dBu F(50,50) contour for a Class C3 station is 23.2 kilometers. Therefore, and as demonstrated by the attached contour map, this site will provide greater than 70 dBu coverage for all of Clatskanie.

The proposed allotment of Channel 225C3 at Clatskanie will provide the first local service to that community.

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Channel 259A at Long Beach, Washington

As outlined in the attached channel study, Channel 259A can be substituted for Channel 224A at Long Beach for use by KAQX in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments, assuming that Channel 253A is substituted for vacant Channel 259A at Ilwaco. For this study the coordinates of the licensed KAQX operation have been proposed.

It is noted that Channel 224A was recently substituted for Channel 232A for use by KAQX at Long Beach, by the Report and Order in MB Docket No. 02-136. That channel substitution was made at the licensed KAQX transmitter site, and the licensee of that station has filed an application to implement its Channel 224A operation at that same location.

Portmeirion pledges to reimburse New Northwest Broadcasters, LLC, the licensee of KAQX, for reasonable expenses in connection with the foregoing channel change, as required by Circleville, Ohio, 8 FCC Rcd 159 (1967), should Portmeirion be the successful bidder for the Clatskanie allotment at auction.

Channel 253A at Ilwaco, Washington

As outlined in the attached channel study, Channel 253A can be substituted for vacant Channel 259A at Ilwaco in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments. For this study the coordinates of the existing Ilwaco Channel 259A allotment have been proposed.

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The allotment of Channel 253A at Ilwaco will create a 9 kilometer short-spacing to Canadian station CIOC-FM on Channel 253C at Victoria, British Columbia. Under the terms of the Working Arrangement for the Allotment and Assignment of FM Broadcasting Channels Under the Agreement Between the Government of Canada and the Government of the United States of America Relating to the FM Broadcasting Service, as amended in 1997 ("Working Arrangement"), the required co-channel Class C to Class A spacing is 247 kilometers, whereas the distance between the Ilwaco allotment site and the CIOC-FM transmitter site is 238 kilometers. The attached allocation study map demonstrates that the Ilwaco 34 dBu F(50,10) contour will not overlap any Canadian land areas.

The proposed operation meets the domestic Class C to Class A spacing requirement of 226 kilometers with respect to CIOC-FM. Therefore, no analysis with respect to interference received from CIOC-FM is believed to be required in this proposal, and the proposed allotment is believed to be in full compliance with domestic and international allocation requirements.

Portmeirion respectfully requests that Channel 253A at Ilwaco be referred to Canada as a specially-negotiated short-spaced allotment.

Portmeirion acknowledges that it may not be strictly necessary to involve the Ilwaco allotment in this proposal. It may be possible to simply substitute Channel 253A for Channel 224A at Long Beach for use by KAQX. However, that substitution would result in a 9 kilometer short-spacing to Canadian station CIOC-FM on Channel 253C at Victoria, British Columbia. Much like the proposed allotment of Channel 253A at Ilwaco, the allotment of Channel 253A at the

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KAQX transmitter site would result in a 34 dBu F(50,10) contour which does not overlap any Canadian land areas, would meet the domestic Class C to Class A spacing requirement of 226 kilometers, and would therefore comply with all international allocation requirements. Portmeirion has no wish to encumber KAQX with an allotment which has an international short-spacing issue, and therefore has included the Ilwaco substitution as a part of this proposal. Nevertheless, should the Commission determine that it is more expedient or spectrally efficient to simply substitute Channel 253A for Channel 224A at Long Beach for use by KAQX, Portmeirion would have no objection to that outcome.

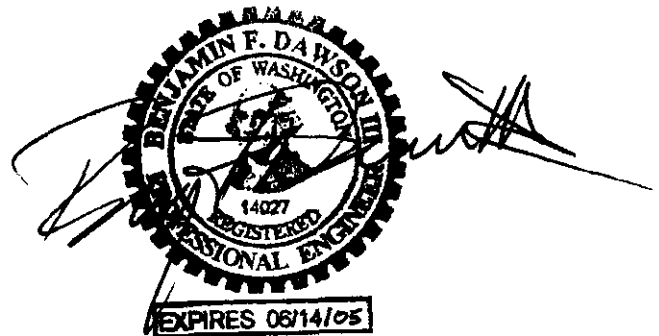
Gain and Loss Areas

There are no gain or loss areas associated with the proposed channel substitutions at Long Beach and Ilwaco. The allotment of Channel 225C3 at Clatskanie will provide 60 dBu service (gain area) to 110,761 persons in a 4,803 sq km area.

Statement of Engineer

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments at Clatskanie, Oregon, and Long Beach and Ilwaco, Washington, has been prepared by Erik C. Swanson under my direct supervision. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson Consulting Engineers and am Registered as a Professional Engineer in the States of Washington and California.

Signed this 1st day of October, 2004



Benjamin F. Dawson III, P.E.

A handwritten signature in cursive script, appearing to read "Erik C. Swanson".

Erik C. Swanson

Hatfield & Dawson Consulting Engineers

SEARCH PARAMETERS

FM Database Date: 040927

Channel: 225C3 92.9 MHz
 Latitude: 46 17 44
 Longitude: 123 14 13
 Safety Zone: 32 km
 Job Title: CLATSKANIE 225C3

Page 1

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KGON	PORTLAND		222C	100.000	45-29-20	154.7	99.05	96
LIC	OR BLH-900820KF		92.3	386.0	122-41-40		3.05	CLOSE
NEW-T	MALONE		222D	0.005	46-53-30	348.4	67.68	0
APP	WA BNPFT-030314AHY		92.3	1013.0	123-24-59		0.00	TRANS
K224CP	HAZEL DELL		224D	0.009	45-40-35	135.7	95.77	0
LIC	WA BLFT-020815AAE		92.7	488.0	122-22-39		0.00	TRANS
	LONG BEACH		224A	0.000	46-18-51	272.2	62.82	89
ADD	WA RM-10668		92.7	0.0	124-03-07		-26.18	SHORT
NOTE:	TO CHANGE TO 259A PER THIS PROPOSAL							
KAQX	LONG BEACH		224A	6.000	46-18-51	272.2	62.82	89
APP	WA BPH-040824ABF		92.7	71.0	124-03-07		-26.18	SHORT
NOTE:	TO CHANGE TO 259A PER THIS PROPOSAL							
	ASTORIA		225C1	0.000	46-10-56	254.0	45.40	211
DEL	OR RM-10668		92.9	0.0	123-48-09		-165.60	SHORT
NOTE:	CHANGED TO CHANNEL 226C3 GLADSTONE IN DOCKET 02-136							
KAST-FM	ASTORIA		225C1	99.000	46-10-56	254.0	45.40	211
LIC	OR BLH-991209AAO		92.9	174.0	123-48-09		-165.60	SHORT
NOTE:	CHANGED TO CHANNEL 226C3 GLADSTONE IN DOCKET 02-136							
KISM	BELLINGHAM		225C	50.000	48-40-48	6.3	266.79	237
LIC	WA BLH-5235		92.9	744.0	122-50-24		29.79	CLEAR
NEW-T	CENTRALIA		225D	0.150	46-43-52	18.5	51.09	0
APP	WA BNPFT-030310BNC		92.9	0.0	123-01-28		0.00	TRANS
NEW-T	NORTH OLYMPIA		225D	0.140	47-03-44	19.8	90.73	0
APP	WA BNPFT-030314CJX		92.9	182.0	122-49-49		0.00	TRANS
K225AX	WHITE CENTER		225D	0.085	47-36-58	25.3	162.96	0
CP	WA BNPFT-030829AXB		92.9	154.0	122-18-28		0.00	TRANS
	GLADSTONE		226C3	0.000	45-32-27	148.0	98.80	99
ADD	OR RM-10668		93.1	0.0	122-33-51		-0.20	SHORT
KAST-FM	GLADSTONE		226C3	0.480	45-29-20	154.7	99.05	99
APP	OR BPH-040824ABE		93.1	387.0	122-41-40	SS	0.05	CLOSE

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SEARCH PARAMETERS

FM Database Date: 040927

Channel: 225C3 92.9 MHz
 Latitude: 46 17 44
 Longitude: 123 14 13
 Safety Zone: 32 km
 Job Title: CLATSKANIE 225C3

Page 2

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K226AI	PORTLAND		226D	0.016	45-21-17	169.5	106.32	0
LIC	OR	BLFT-970722TH	93.1	417.0	122-59-23		0.00	TRANS
K226AN	MONTESANO		226D	0.250	46-57-31	340.1	78.47	0
CP	WA	BNPFT-030724AFR	93.1	145.0	123-35-18		0.00	TRANS
K227AJ	WOODLAND		227D	0.095	45-46-35	143.7	71.50	0
LIC	WA	BLFT-020807AAO	93.3	157.0	122-41-30		0.00	TRANS
NEW-T	FORDS PRAIRIE		228D	0.250	46-43-13	17.5	49.54	0
APP	WA	BNPFT-030314BJX	93.5	80.0	123-02-29		0.00	TRANS

44444 END OF FM SPACING STUDY FOR CHANNEL 225 44444

SEARCH PARAMETERS

FM Database Date: 040927

Channel: 259A 99.7 MHz
 Latitude: 46 18 51
 Longitude: 124 3 7
 Safety Zone: 32 km
 Job Title: LONG BEACH 259A

Page 1

Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
K206CL	CHINOOK		206D	0.013	46-17-10	104.7	12.32	0
LIC	WA	BLFT-000825AGM	89.1	423.0	123-53-50		0.00	TRANS
KAYOaux	ABERDEEN		257C1	0.680	46-58-31	43.1	101.41	0
LIC	WA	BXLH-000822ABQ	99.3	615.0	123-08-21		0.00	AUX
KAYO-FM	ELMA		257C	0.000	47-14-17	15.3	106.58	95
RSV	WA	-	99.3	0.0	123-40-45		11.58	CLEAR
KAYO-FM	ELMA		257C	41.000	47-19-12	25.4	124.16	95
LIC	WA	BLH-040723ACJ	99.3	620.0	123-20-41	SS	29.16	CLEAR
KWJJ-FM	PORTLAND		258C1	52.000	45-29-20	130.7	139.68	133
LIC	OR	BLH-911106KG	99.5	386.0	122-41-40		6.68	CLOSE
KWJJaux	PORTLAND		258C1	23.000	45-29-20	130.7	139.68	0
LIC	OR	BLH-920212KC	99.5	312.0	122-41-40		0.00	AUX
K259BG	CHEHALIS		259D	0.200	46-48-15	49.9	85.30	0
CP	WA	BNPFT-030826AOB	99.7	188.0	123-11-45		0.00	TRANS
	ILWACO		259A	0.000	46-18-33	125.9	0.95	115
ADD	WA	RM-10668	99.7	0.0	124-02-31		-114.05	SHORT
NOTE: TO CHANGE TO 253A PER THIS PROPOSAL								

44444 END OF FM SPACING STUDY FOR CHANNEL 259 44444

SEARCH PARAMETERS

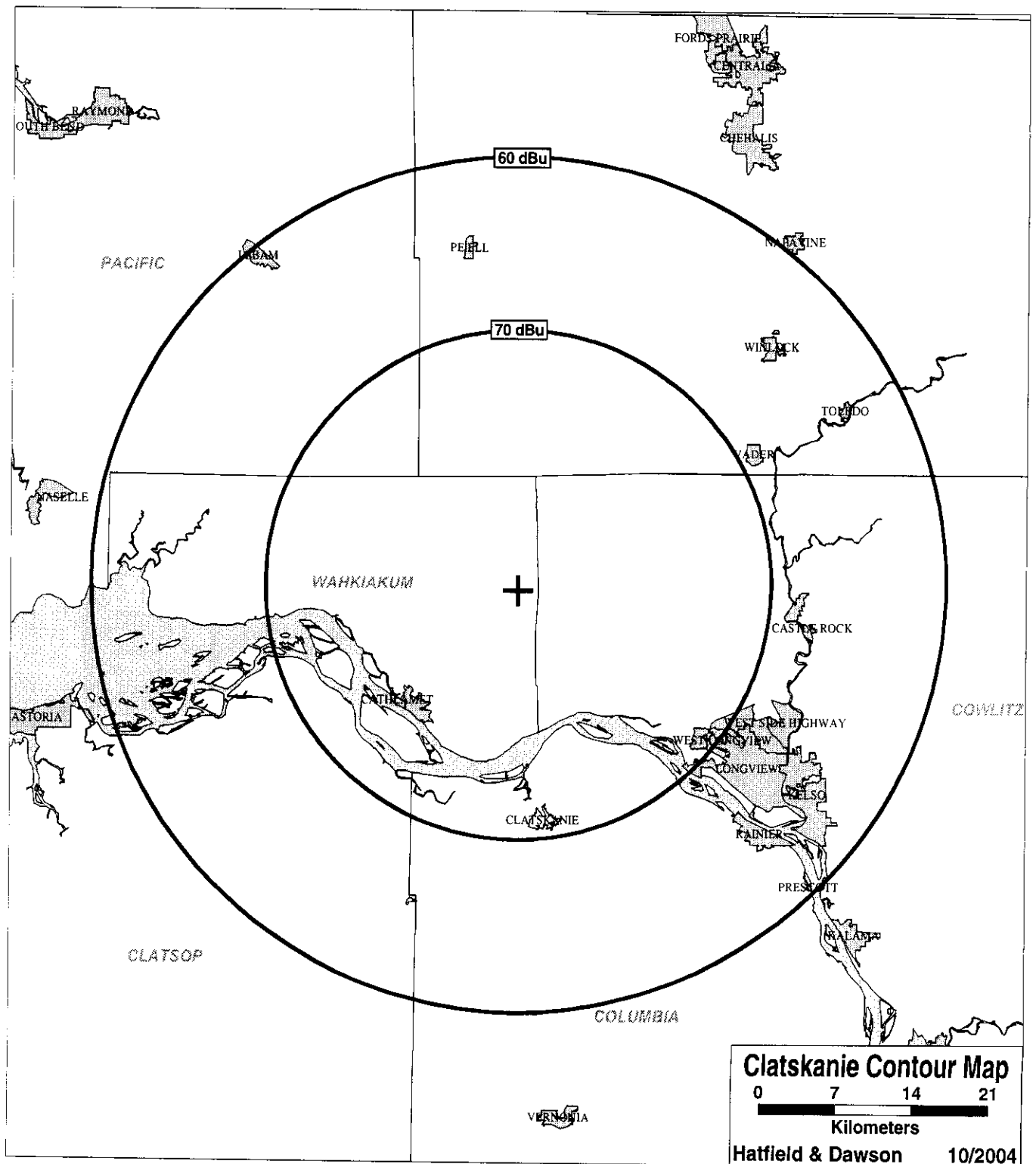
FM Database Date: 040927

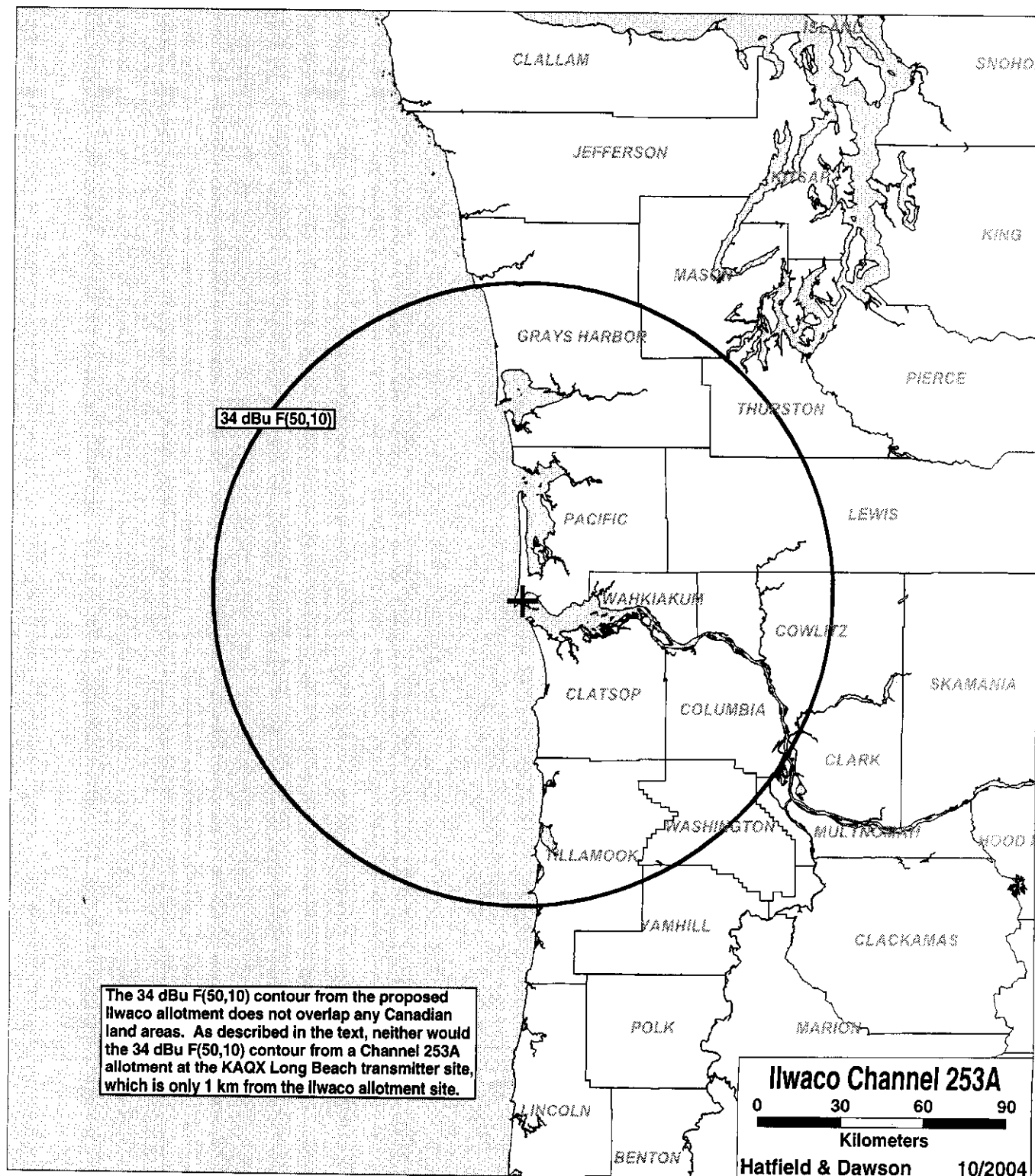
Channel: 253A 98.5 MHz
 Latitude: 46 18 33
 Longitude: 124 2 31
 Safety Zone: 32 km
 Job Title: ILWACO 253A

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Call Status	City St	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-True	Dist (km)	Req (km)
KCYS	SEASIDE		251A	6.000	45-57-08	168.5	40.49	31
LIC	OR	BLH-000225AAK	98.1	100.0	123-56-14		9.49	CLOSE
APP	RAINIER		252A	0.000	46-12-24	98.0	78.22	72
	OR	BSFH-040729AWC	98.3	0.0	123-02-18		6.22	CLOSE
VAC	RAINIER		252A	0.000	46-10-18	100.0	84.71	72
	OR	-	98.3	0.0	122-57-42		12.71	CLEAR
NEW-T	LONGVIEW		252D	0.019	46-02-58	108.1	91.42	0
APP	WA	BNPFT-030317KJM	98.3	346.0	122-55-07		0.00	TRANS
NEW-T	LONGVIEW		252D	0.023	46-02-59	108.1	91.35	0
APP	WA	BNPFT-030826ABM	98.3	335.0	122-55-10		0.00	TRANS
CIOC-FM	VICTORIA		253C	100.000	48-25-07	9.5	237.94	247
LIC	BC	-	98.5	147.0	123-30-36		-9.06	SHORT
NOTE: SEE TEXT FOR DISCUSSION OF THIS INTERNATIONAL SHORT-SPACING								
NEW-T	CENTRALIA		253D	0.250	46-43-52	58.6	91.08	0
APP	WA	BNPFT-030310BNF	98.5	83.0	123-01-28		0.00	TRANS
NEW-T	CHEHALIS		253D	0.016	46-33-17	69.7	80.44	0
APP	WA	BNPFT-030314BKK	98.5	394.0	123-03-27		0.00	TRANS
NEW	HOQUIAM		253L1	0.000	46-58-22	11.0	75.18	0
APP	WA	BNPL-010613AHJ	98.5	0.0	123-51-10		0.00	LPFM
NEW-T	OLYMPIA		253D	0.250	47-00-58	47.1	116.64	0
APP	WA	BNPFT-030317HRF	98.5	134.0	122-54-57		0.00	TRANS
NEW-T	TENINO		253D	0.016	46-50-34	58.3	114.60	0
APP	WA	BNPFT-030310ATP	98.5	406.0	122-45-46		0.00	TRANS
NEW-T	UNION MILL		253D	0.140	47-03-42	47.4	124.88	0
APP	WA	BNPFT-030314AHM	98.5	168.0	122-49-48		0.00	TRANS
KUPL-FM	PORTLAND		254C1	37.000	45-30-58	130.6	134.47	133
LIC	OR	BLH-970915KD	98.7	440.0	122-43-59		1.47	CLOSE
KUPLaux	PORTLAND		254C1	11.000	45-30-57	130.5	134.61	0
LIC	OR	BXLH-031107AAG	98.7	362.0	122-43-52		0.00	AUX
KUPLaux	PORTLAND		254C1	16.000	45-27-13	128.9	150.11	0
LIC	OR	BXMLH-000316ABX	98.7	337.0	122-32-45		0.00	AUX
K254AP	OLYMPIA		254D	0.004	46-58-23	42.7	101.14	0
CP	WA	BPFT-011218ABA	98.7	753.0	123-08-19		0.00	TRANS

44444 END OF FM SPACING STUDY FOR CHANNEL 253 44444

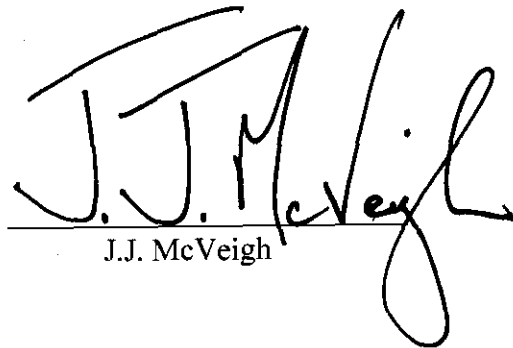




CERTIFICATE OF SERVICE

I hereby certify that I have this Sixth day of October, 2004, sent a copy of the foregoing
“**PETITION FOR RULE MAKING AND FOR ORDER TO SHOW CAUSE**” by first class United
States mail, postage prepaid, to:

M. Anne Swanson, Esq.
Dow, Lohnes & Albertson PLLC
1200 New Hampshire Avenue, NW
Washington, D.C. 20003-6802
Counsel to New Northwest Broadcasters, LLC,
License, Station KAQX(FM)



J.J. McVeigh